

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR 19-40074

Plaintiff,

REDACTED INDICTMENT

vs.

Mail Theft
18 U.S.C. § 1708

JENNIFER GROETHE,

Mail Fraud
18 U.S.C. § 1341

Defendant.

The Grand Jury Charges:

COUNT 1
(Mail Theft)

On or about between October 23, 2018, and December 3, 2018, in the District of South Dakota, the defendant, Jennifer Groethe, did steal, take, and abstract letters, postal cards, packages, and mail from and out of authorized depositories for United States mail matter, and did abstract and remove from such letters, postal cards, packages, and mail, articles and things contained therein, and did secrete, embezzle and destroy such letters, postal cards, packages, and mail and articles and things therein, namely, Jennifer Groethe did steal mail matter addressed to Load King, P.O. Box 427, Elk Point, South Dakota 57025, all in violation of 18 U.S.C. § 1708.

COUNTS 2-13
(Mail Fraud)

1. On or about between February 21, 2018 and January 8, 2019, in the District of South Dakota and elsewhere, the Defendant, Jennifer Groethe,

did willfully and unlawfully devise, and intend to devise, a scheme and artifice to defraud for obtaining money and property by means of false and fraudulent pretenses, representations, and promises.

2. Throughout the relevant time period, the Defendant was employed by Load King as an accounting and sales coordinator. Her duties included collecting incoming checks sent to Load King in Elk Point, South Dakota, via the United States Postal Service. She also credited accounts receivable and was supposed to deposit checks into Load King's bank account.

3. The Defendant's employer, Load King, sold scrap metals to Sioux City Compressed Steel (SCCS).

4. As part of the scheme and artifice to defraud, the defendant contacted Sioux City Compressed Steel, and falsely represented to them that her name should be added as a payee to checks payable to Load King.

5. As part of the scheme and artifice to defraud her employer, Load King, the Defendant did take from the mails, checks from Sioux City Compressed Steel addressed to Load King, 701 East Rose Street, Elk Point, South Dakota, 57025.

6. As part of the scheme and artifice to defraud, the Defendant cashed the checks at Wells Fargo Bank in Sioux City, Iowa, by falsely representing that Load King authorized her to do so. The Defendant cashed each check and kept the funds for per personal use and deprived Load King of its funds and property.

7. On or about the dates listed below, the Defendant took checks from the mail for the purpose of executing the scheme and artifice to defraud as follows:

Count	Date	Sender	Recipient	Item mailed
2	February 21, 2018	SCCS	Load King	\$4,948.75 check
3	March 7, 2018	SCCS	Load King	\$2,258.00 check
4	April 4, 2018	SCCS	Load King	\$13,292.51 check
5	April 18, 2018	SCCS	Load King	\$3,092.77 check
6	May 9, 2018	SCCS	Load King	\$12,832.70 check
7	May 29, 2018	SCCS	Load King	\$5,966.51 check
8	August 2, 2018	SCCS	Load King	\$8,965.88 check
9	September 4, 2018	SCCS	Load King	\$18,957.31 check
10	October 4, 2018	SCCS	Load King	\$22,306.28 check
11	November 7, 2018	SCCS	Load King	\$13,064.99 check
12	December 6, 2018	SCCS	Load King	\$19,572.97 check
13	January 8, 2019	SCCS	Load King	\$10,555.46 check

All in violation of 18 U.S.C. § 1341.

A TRUE BILL:

Name Redacted

Foreperson

RONALD A. PARSONS, JR.
United States Attorney

By: 